

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ALONSO GUADALUPE MEJIA,
a/k/a JUNIOR;
CANDICE ANDREA VALDEZ;
JUSTIN ALLEN MORIN;
ALLISON MARIE MORAN; and
VICKI LEE SHERVEN

SUPERSEDING
INDICTMENT

Case No. 1:25-cr-066

Violations: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C),
846, 856(a)(1), and 856(b); and 18 U.S.C.
§§ 922(g)(1), 924(a)(8), 924(c)(1)(A),
and 2

COUNT ONE

**Conspiracy to Distribute and Possess with Intent to Distribute
Controlled Substances**

The Grand Jury Charges:

Beginning sometime prior to, and continuing until, in or about March 2025, in the
District of North Dakota, and elsewhere,

ALONSO GUADALUPE MEJIA, a/k/a JUNIOR;
CANDICE ANDREA VALDEZ;
JUSTIN ALLEN MORIN;
ALLISON MARIE MORAN; and
VICKI LEE SHERVEN

knowingly and intentionally combined, conspired, confederated, and agreed together and
with others, both known and unknown to the grand jury, to distribute and possess with
intent to distribute controlled substances, including (i) a mixture and substance containing
a detectable amount of methamphetamine, a Schedule II controlled substance; and (ii) a
mixture and substance containing a mixture and substance containing a detectable

amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Drug Quantity

With respect to ALONSO GUADALUPE MEJIA, a/k/a JUNIOR, and CANDICE ANDREA VALDEZ; the amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), involved in the conspiracy attributable to these individuals as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual, is 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to ALONSO GUADALUPE MEJIA, a/k/a JUNIOR, and CANDICE ANDREA VALDEZ, the amount of methamphetamine involved in the conspiracy attributable to this individual as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to VICKI LEE SHERVEN, the amount of methamphetamine involved in the conspiracy attributable to this individual as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual, is 50 grams or more of a mixture and substance containing a detectable

amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, methamphetamine and opiate pills and tablets containing fentanyl in and about the areas of Bismarck and Mandan, North Dakota, the Fort Berthold Indian Reservation within North Dakota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities by, among other things, (i) concealing controlled substances within motor vehicles and in containers; (ii) utilizing multiple locations to store controlled substances; and (iii) using aliases;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones and social media and financial transaction applications, to facilitate the distribution of controlled substances and collection of drug proceeds;
5. It was a further part of said conspiracy that defendants possessed, received, and transferred firearms in order to protect the supply of controlled substances and the

proceeds of drug trafficking activity, and to use as currency for drug trafficking conduct;
and

6. It was a further part of said conspiracy that conspirators traveled between Arizona, Colorado, and North Dakota to acquire, transport, and distribute controlled substances, and to collect, receive, transport and transfer proceeds of drug trafficking activity;

In violation of Title 21, United States Code, Section 846, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Possession with Intent to Distribute Controlled Substances
(400 grams or more fentanyl – mixture)**

The Grand Jury Further Charges:

On or about January 16, 2025, in the District of North Dakota, and elsewhere,

ALONSO GUADALUPE MEJIA, a/k/a JUNIOR; and
CANDICE ANDREA VALDEZ,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

In or about January 2025, in the District of North Dakota, and elsewhere,

ALONSO GUADALUPE MEJIA, a/k/a JUNIOR; and
CANDICE ANDREA VALDEZ,

individually, and by aiding and abetting, knowingly possessed a firearm, namely: (i) one Smith & Wesson, Model M&P 9 Shield Plus, 9mm caliber pistol, Serial Number JNX5386; and (ii) one Anderson Manufacturing, Model AM-15, 5.56 caliber rifle, Serial Number 15013625, in furtherance of a drug trafficking crime for which ALONSO GUADALUPE MEJIA, a/k/a JUNIOR, and CANDICE ANDREA VALDEZ may be prosecuted in a court of the United States, namely: (i) Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances; and (ii) Possession with Intent to Distribute Fentanyl (400 grams or more – mixture), as alleged in Counts One and Two of this Superseding Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FOUR

**Possession with Intent to Distribute Controlled Substances
(methamphetamine – 50 g or more mixture)**

The Grand Jury Further Charges:

On or about December 9, 2024, in the District of North Dakota, and elsewhere,

VICKI LEE SHERVEN,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIVE

Possession with Intent to Distribute Fentanyl

The Grand Jury Further Charges:

On or about December 9, 2024, in the District of North Dakota,

VICKI LEE SHERVEN,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

Possession of Firearm and Ammunition by Prohibited Person

The Grand Jury Further Charges:

On or about December 9, 2024, in the District of North Dakota,

VICKI LEE SHERVEN,

knowing that she had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, to-wit:

- Assault with a Dangerous Weapon, on or about August 27, 2019, in United States District Court for the District of North Dakota, Case No. 1:18-cr-092; and,
- Possession with Intent to Deliver a Controlled Substance – Heroin (Count Two) and Possession of Drug Paraphernalia (Count Three), felonies, on or about August 9, 2021, in North Dakota District Court, East Central Judicial District, Cass County, Case No. 09-2021-CR-00487;

individually, and by aiding and abetting, did knowingly possess in and affecting commerce a firearm and ammunition, namely:

- One Colt, Model Frontier Scout, .22 caliber revolver, Serial Number 1966LM;
- Approximately six (6) rounds of Imperial Metals, .22 caliber ammunition;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 2.

COUNT SEVEN

Maintaining Drug-Involved Premises

The Grand Jury Further Charges:

Beginning sometime in or about 2024, and continuing until in or about January 2025, in the District of North Dakota,

JUSTIN ALLEN MORIN and
ALLISON MARIE MORAN,

individually, and by aiding and abetting, knowingly opened, leased, rented, used, and maintained any place, whether permanently or temporarily, for the purpose of distributing and using any controlled substance; specifically, JUSTIN ALLEN MORIN and ALLISON MARIE MORAN opened, leased, rented, used, and maintained a residence located at 1119 South University Drive in Bismarck, North Dakota, for purposes of acquiring and distributing (i) opiate pills and tablets that were a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance; and (ii) a mixture and substance containing a detectable amount of a methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 856(a)(1) and 856(b), and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

Upon conviction of the offenses alleged in Counts One, Three, and Six of this Superseding Indictment,

ALONSO GUADALUPE MEJIA, a/k/a JUNIOR;
CANDICE ANDREA VALDEZ; and
VICKI LEE SHERVEN

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense(s), including, but not limited to:

- One Smith & Wesson, Model M&P 9 Shield Plus, 9mm caliber pistol, Serial Number JNX5386;
- One Anderson Manufacturing, Model AM-15, 5.56 caliber rifle, Serial Number 15013625;
- One Colt, Model Frontier Scout, .22 caliber revolver, Serial Number 1966LM; and
- Approximately six (6) rounds of Imperial Metals, .22 caliber ammunition.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Jennifer Klemetsrud Puhl
JENNIFER KLEMETSRUD PUHL
Acting United States Attorney

RLV/js